



MaineCare Non Emergency Medical Transportation System Redesign

Tribal Consultation

September 21, 2011

http://www.maine.gov/dhhs/oms/nemt/nemt_index.html

All documents and materials concerning the NEMT project reflect MaineCare's current thinking and are subject to change. No materials on NEMT web page, distributed and discussed at meetings or sent in emails or mailings are binding in any way concerning the future procurement process.

Agenda

- Welcome & Session Objectives 12:00 – 12:05
- Overview of Current System 12:05 – 12:10
- Overview of the Risk-Based Brokerage Model 12:10 – 12:25
- Proposal to Address Tribal Concerns 12:25 – 12:40
- State Concerns with Tribes Acting as own Brokers 12:40 – 12:55
- Target Timeline & Next Steps 12:55 – 1:00

Session Objectives

- Present overview of the current NEMT system and the planned brokerage model.
- Present state proposal for brokerage system to address tribal concerns
- Provide a forum for discussion regarding tribal concerns and the model design.
- Outline the initiative's target timeline and next steps.

The presentation from today's discussion will be posted to the NEMT Redesign website:

http://www.maine.gov/dhhs/oms/nemt/nemt_index.html

Current NEMT System

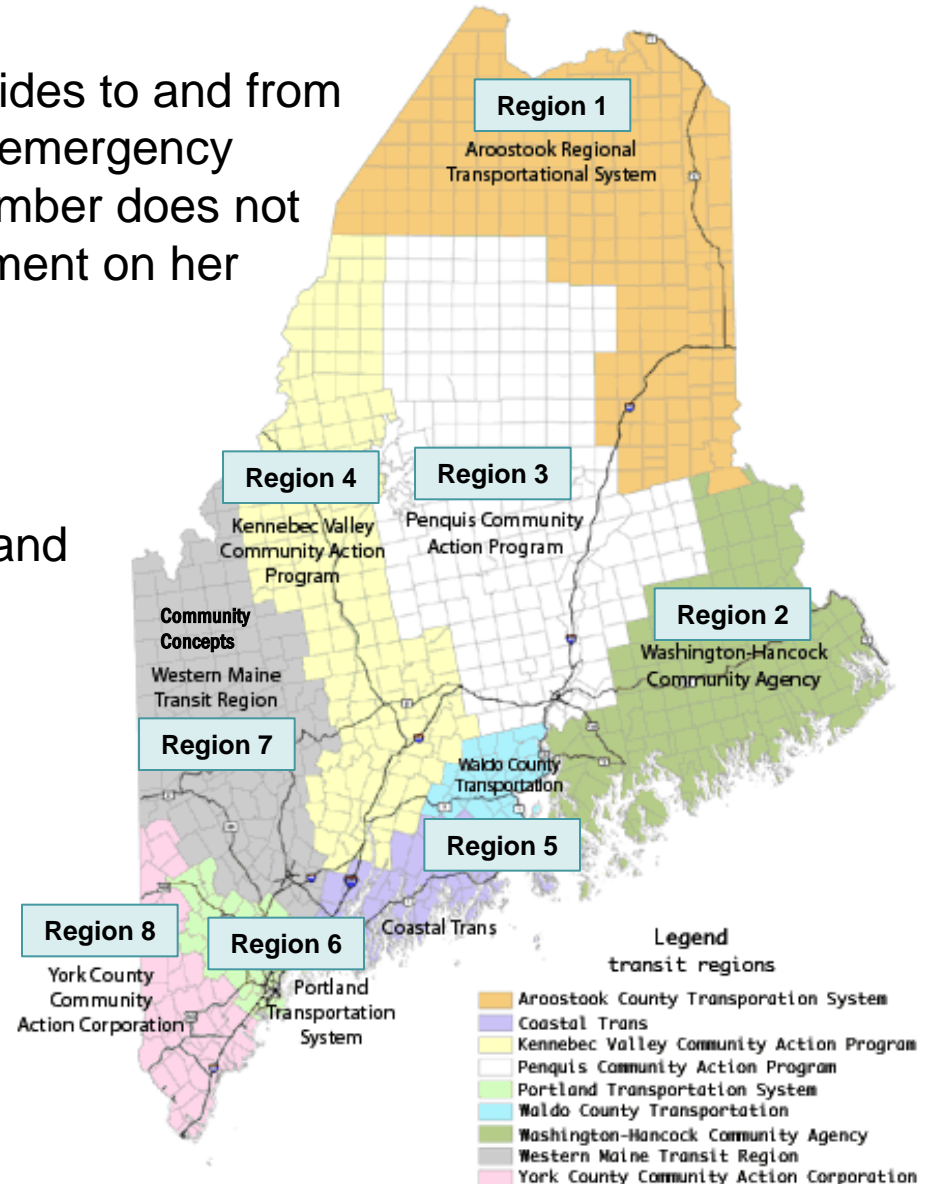
What are NEMT Services?

NEMT services are used to give members rides to and from doctor appointments or other covered, non-emergency Medicaid services when the MaineCare member does not have an alternate way to get to the appointment on her own.

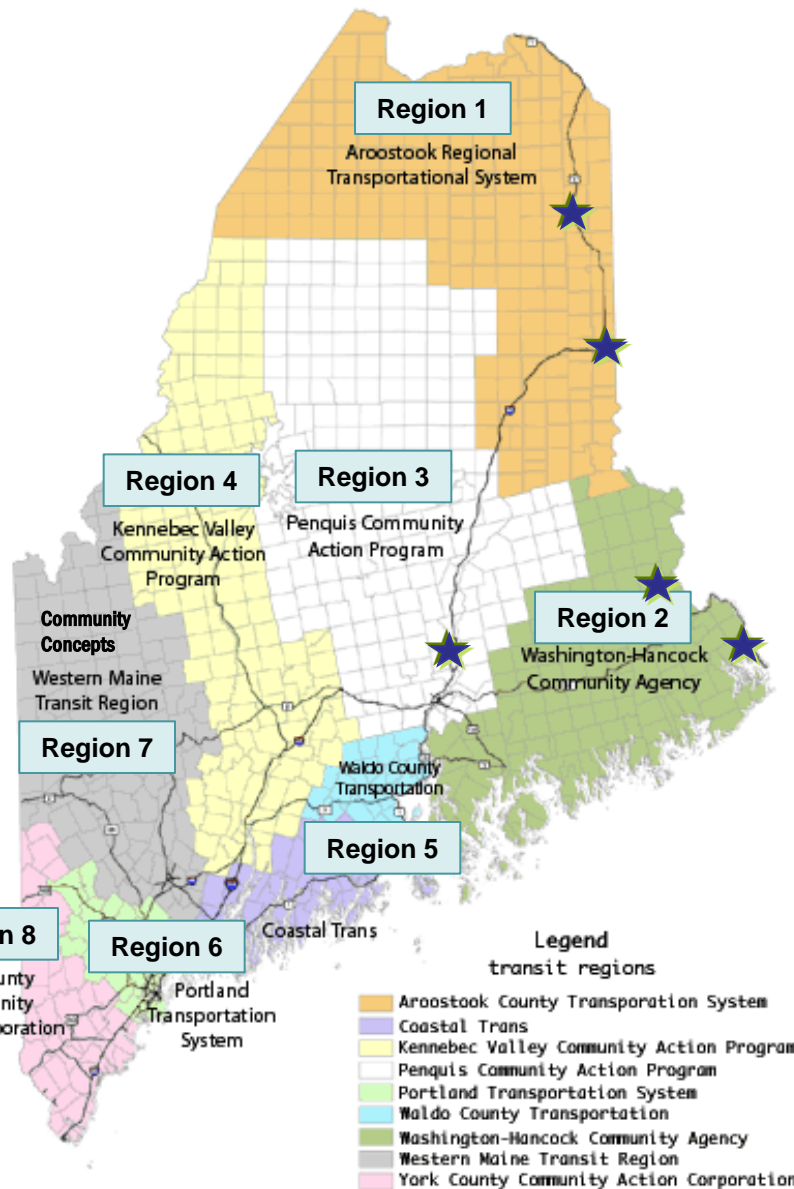
How does NEMT function in Maine?

Currently, 10 Full Service Regional Transportation Providers (FSRTPs) broker and provide transportation in Maine's 8 transit regions. MaineCare currently covers the following transportation modes:

- Agency vehicles
- Volunteer reimbursement
- Family, friends & member reimbursement
- Fixed Route Transit (two regions)
- Wheelchair van
- Taxi



Maine's five tribes fall into three of the Maine transit districts.



Region 1 (ARTS)

- Aroostook Band of Micmacs, Presque Isle
- Houlton band of Maliseet Indians, Houlton

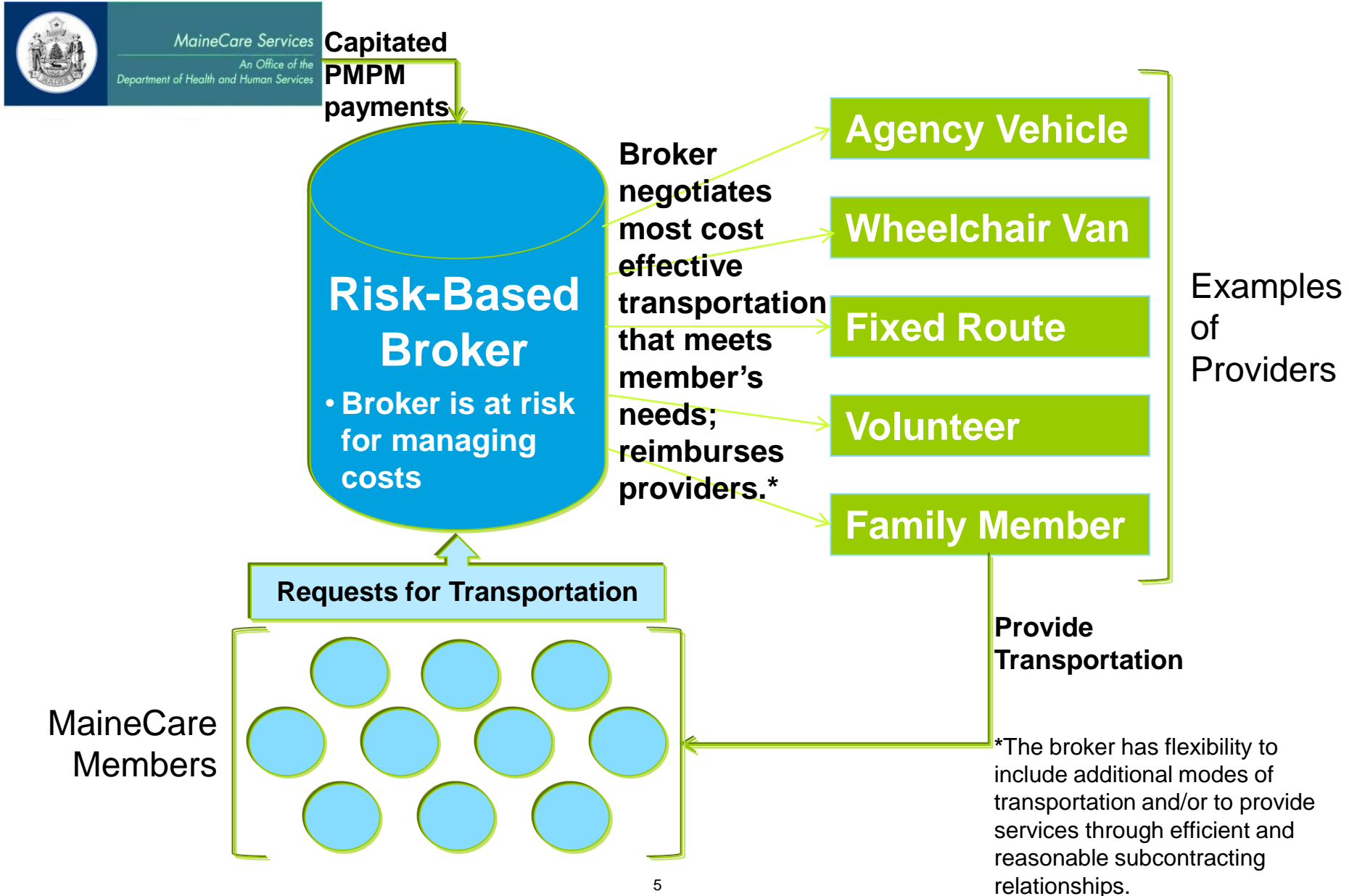
Region 2 (WHCA)

- Passamaquoddy Tribe of Indian Township, Princeton
- Passamaquoddy Tribe at Pleasant Point, Perry

Region 3 (Penquis)

- Penobscot Nation, Old Town

How does a risk-based brokerage system function?



A New Direction

- **March 2011:** The Department communicated to CMS in early March about our intention to restructure NEMT under a single, statewide risk-based PAHP.
- **July 2011:** In collaboration with the Governor's Office and MaineDOT, we decided to restructure NEMT as a regional system of risk-based PAHP brokerages that align with the current eight Maine transit districts.

As with the original statewide recommendation, this approach will:

- Achieve compliance with CMS
- Maintain federal match levels
- Ensure improved access to eligible MaineCare members

In addition, a regional brokerage system will better ensure continuation of a *coordinated, community-based* approach to transportation. Brokers will be at risk for managing a fixed per member per month rate to meet eligible members' transportation needs and to meet prescribed quality benchmarks.

How will the new system differ from the current system?

	Current System	Planned
Brokers	<ul style="list-style-type: none"> • 10 FSRTPs across 8 transit districts 	<ul style="list-style-type: none"> • Up to 8 brokers aligned with transit districts • Open to for-profit, non-profit or governmental entities
Competition	<ul style="list-style-type: none"> • OMS designates the FSRTPs, which hold standard, non-competitive provider agreements 	<ul style="list-style-type: none"> • Bidder must compete for the brokerage
Risk	<ul style="list-style-type: none"> • Brokers paid fee for service. State at risk 	<ul style="list-style-type: none"> • Brokers must manage within a per member per month capitated rate
Federal Match	<ul style="list-style-type: none"> • Cannot continue to receive FMAP for many services 	<ul style="list-style-type: none"> • May receive full FMAP
Member Access	<ul style="list-style-type: none"> • Problems with consistent member access to after-hours and weekend appointments and urgent care 	<ul style="list-style-type: none"> • Bidders must demonstrate the ability to provide 24/7 access in order to qualify as a PAHP
Accountability	<ul style="list-style-type: none"> • The State has no authority to restrict payment or terminate the relationship if an FSRTTP fails to meet quality standards 	<ul style="list-style-type: none"> • The State will tie payment to specified quality benchmarks and may terminate the contract with a broker for non-compliance
Transportation Options	<ul style="list-style-type: none"> • The State may only reimburse bus passes in Portland and Bangor 	<ul style="list-style-type: none"> • Brokers will be encouraged to utilize all fixed route transit options statewide, such as ZOOM, the Kennebec Explorer, City Link, and the Bath Shuttle Bus
Reimbursement	<ul style="list-style-type: none"> • Providers, volunteers, family, friends and members all receive fixed reimbursement rates for providing transportation 	<ul style="list-style-type: none"> • Rates will be negotiable with the Broker

Follow-up: Potential challenges with tribes acting as own Brokers

- **Option 1:** Tribes could compete to be the at-risk broker in their transit regions
 - **Potential Challenge:**
 - Tribes likely to lack capacity and scale to serve entire transit region and meet CMS' 24/7 access requirements.
- **Option 2:** The state could carve tribal lands into geographically distinct at-risk brokerages
 - **Potential Challenge:**
 - Tribes would still need to compete for the brokerage and may have difficulty meeting 24/7 access requirements.
 - Brokers are limited to 25% self-referral of all trips.
 - Tribal members would not be able to go through other Brokers for transportation.
- **Option 3:** Exclude tribes from the at-risk brokerage
 - **Potential Challenge:**
 - Federal match implications for state unclear.
 - Tribal members would be prohibited from utilizing other Brokers.

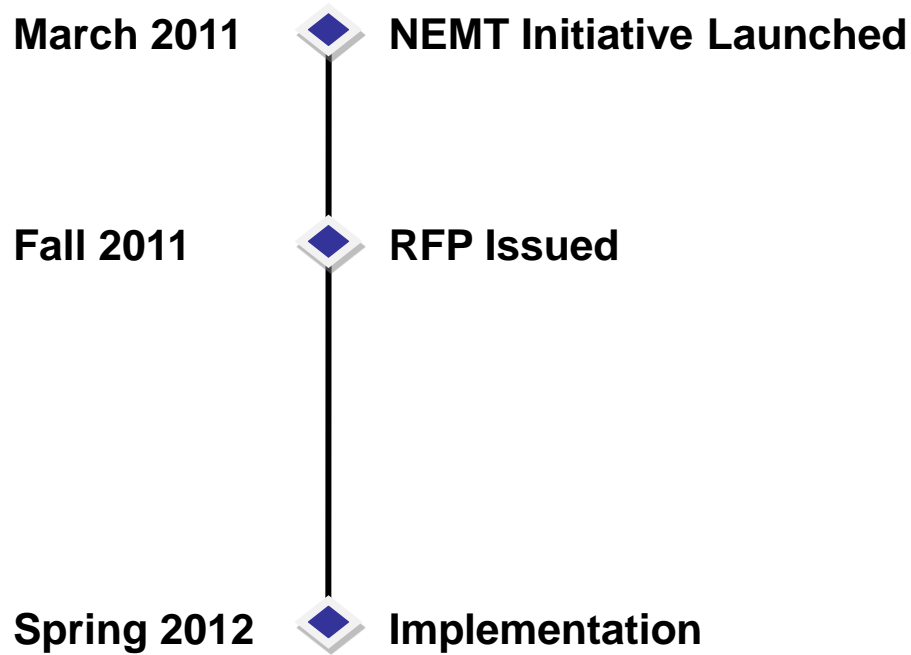
Note: All options would present data analytic challenges to the state re rate calculation and member tracking that would delay implementation of a new system and, therefore, CMS compliance.

How will the new brokerage system address tribal concerns?

- Brokers must subcontract with tribes that would like to be their own transportation providers and that meet provider qualifications.
- The state will ensure that negotiated rates between the Broker and the tribal provider are adequate and reasonable given other area rates and the cultural expertise offered by the tribal provider.
- Bidders will be encouraged to leverage existing, efficient and effective tribal systems and resources for volunteer recruitment, coordination and, where appropriate, volunteer and family, friends and member reimbursement through sub contractual or other proposed arrangements.
- The Broker must have representation from federally recognized tribes on a regional advisory committee to review and discuss broker performance, coordination with local resources, and other community concerns.
- Increased oversight by the state on Broker performance; Broker payment tied to ability to meet quality benchmarks



High-Level Target Timeline



Next Steps

- **September:** Submit 1915(b) waiver submission for at-risk brokerage
- **Fall RFP**
 - RFP open for 2.5 months
 - Bidders' Conference ~2 weeks after RFP is posted
 - Mandatory Letters of Intent due 30 days after Bidders' Conference
- **Winter:** Award & Decision Letters

Thank you!

Please visit our NEMT Redesign website for materials from today and to keep up to date:

http://www.maine.gov/dhhs/oms/nemt/nemt_index.html

Additional questions or comments?

Contact Michelle Probert at michelle.probert@maine.gov